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Attorneys for Creditor MICHAEL BORDEN

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:	)	
ROBIN LINUS LEHNER and DONYA TINA	)	Lead Case No.: 22-14616-nmc
LEHNER,	)	Chapter 7
	)	
Debtors.	)	
	)	
	)	

**NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE OF  
CREDITOR MICHAEL BORDEN**

Timothy S. Cory, Esq. and R. Christopher Reade, Esq. and the law firm of Cory Reade Dows and Shafer, attorneys for Creditor MICHAEL BORDEN, hereby enter their appearance on the record in the above-entitled bankruptcy proceeding pursuant to Rules 2002, 4009, 9007, 9010 and 9014(b) and hereby requests special notice of all hearings, actions, contested matters and adversary proceedings in this case, together with copies of all notices, pleadings, motions, responses and other related materials that are issued or filed in connection with these proceedings by the Court, Debtor or any other parties of interest in the above-entitled matters. All notices and copies in response to the foregoing and, pursuant to LR 2002 and 4009, all notices required to be mailed by Claimant shall be directed to

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in Bankruptcy Rule 2002, but also, without limitation, notices of any orders or other pleadings, motions, applications, complaints, demands, hearings, requests, petitions, objections, answering or reply papers, and any memoranda or briefs in support of any of the foregoing, and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telecopier, facsimile, e-mail or otherwise.

This Request for Special Notice shall not be deemed to be a waiver of the above-named parties-in-interests' right to (1) have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (2) arbitration or trial by jury in any proceeding so referred or triable in this case or any case, controversy, or proceeding related to these cases, (3) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights claims, actions, set-offs, or recoupments to which the above-named party-in-interest is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, set-offs, and recoupments the above-named party—in-interest expressly reserves.

....

1 The foregoing counsel on behalf of the parties so name herein furthermore request a list  
2 of the creditors in question for purposes of service from this date.

3 DATED this 17<sup>th</sup> day of January, 2023.

4 CORY READE DOWS AND SHAFER

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6 By: /s/ R. Christopher Reade  
7 TIMOTHY S. CORY, ESQ.  
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17 Attorneys for Creditor MICHAEL BORDEN  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of January, 2023, that I completed service of the foregoing NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE by electronic service in accordance with Administrative Order 02-1 of the United States Bankruptcy Court for the District of Nevada on the date hereof and that said service was completed through the Notice of Electronic Filing automatically generated by said Court.

/s/ Elizabeth Arthur  
An employee of Cory Reade Dows and Shafer